

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SCHULMERICH BELLS, LLC, *et al.*,

Plaintiffs,

v.

THOMAS W. WOLF, *et al.*,

Defendants.

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CIVIL ACTION

No. 20-1637

STIPULATION AND ORDER

Defendants Thomas W. Wolf and Rachel Levine, by counsel, and Plaintiffs Schulmerich Bells, LLC, Frank Carbalo, and Wendy Helverson, by counsel, agree and stipulate as follows:

1. Plaintiffs initiated this matter by filing their Complaint with this Court on March 26, 2020. ECF No. 1.
2. Plaintiffs served the Complaint by waiver on May 13, 2020, and both Defendants agreed to waive service and respond by July 13, 2020.
3. Following discussions by the parties, Plaintiffs wish to file an Amended Complaint pursuant to Federal Rule of Civil Procedure 15(a)(2), and Defendants do not object.
4. Plaintiffs preserve their right to file an amended complaint pursuant to Federal Rule of Civil Procedure 15(a)(1)(B), within “21 days after service of a responsive pleading or 21 days after service of a motion under Rule 12(b), (e), or (f), whichever is earlier.” Fed. R. Civ. P. 15(a)(1)(B).
5. The parties stipulate and agree, pending approval by the Court, that Plaintiffs shall file any amended complaint within 30 days, or by **August 12, 2020**.

6. The Defendants shall respond to any amended complaint no later than 21 days after service of the pleading.

Dated: July 13, 2020

Respectfully submitted,

/s/ Stephen R. Kovatis
Stephen R. Kovatis
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*Counsel for Defendants Thomas W. Wolf
and Rachel Levine*

/s/ Shawn M. Rodgers
Shawn M. Rodgers
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*Counsel for Plaintiffs Schulmerich Bells,
LLC, Frank Carballo, and Wendy Helverson*

IT IS SO ORDERED:

/s/ Cynthia M. Rufe
Rufe, J.

Date: July 13, 2020